



<p>February 17, 2014</p> <p style="text-align: right;">Comment Letter I83</p> <div style="text-align: center;">  </div> <p>To: County of San Diego          Planning and Development Services          Project Processing Counter          5510 Overland Ave, suite 110          San Diego, CA 92123</p> <p>Re: COMMENTS ON          SOITEC SOLAR DEVELOPMENT PROJECT          Draft Program Environmental Impact Report (PIER)</p> <p><u>SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, LOG NO.PDS2012-3910-120005 (ER); 3800-12-010 (GPA); TIERRA DEL SOL, 3300-12-010 (MUP); 3600-12-005 (REZ); 3921-77-046-01 (AP); RUGGED SOLAR, 3300-12-007 (MUP); SCH NO.2012121018</u></p> <p>From: Daniel Renard          41148 Old Highway 80          Boulevard, Ca, 91905</p> <p>Dear Director and Staff;</p> <p>I and my family own property and live in Boulevard. We are concerned about the inevitable negative effects that bulldozing the life</p> <div style="text-align: right;">  <p>I83-1</p> </div>	<p style="text-align: center;"><b>Response to Comment Letter I83</b></p> <p style="text-align: center;"><b>Daniel Renard</b>  <b>February 20, 2014</b></p> <p><b>I83-1</b>      The County of San Diego (County) acknowledges the commenter's concern regarding the environmental impacts of the Proposed Project. The County also acknowledges the commenter's request that the Proposed Project not be approved without a determination that the Proposed Project would not result in or have the potential to result in impacts affecting fish, wildlife, and habitat. The information in this comment letter will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.</p> <p>The DPEIR has analyzed impacts to fish, wildlife, and habitat related to the Proposed Project in accordance with the California Environmental Quality Act (CEQA) and the <i>County Guidelines for Determining Significance: Biological Resources</i> (DPEIR, Section 2.3.3). The DPEIR addressed the issues identified in the comment, including direct impacts to species and habitat with vegetation removal and construction equipment and indirect impacts, including impacts from fugitive dust, noise, habitat fragmentation, pollutants, changes in hydrology, shading, increased human presence, and invasive species (DPEIR Section 2.3.3.1).</p>
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	<p>The commenter references a “No Effect Determination” (NED) in order to accomplish the commenter’s preferred outcome. An NED is made by the California Department of Fish and Wildlife (CDFW) pursuant to Title 14, California Code of Regulations Section 753.5(c)(1)(A), solely for the purpose of the CDFW determining whether a project proponent must submit a filing fee to the CDFW for a project subject to CEQA. Where the project will have no effect on fish and wildlife, the CDFW issues an NED and no filing fee is required. The CDFW provides that “An NED ... is not part of the assessment a lead agency makes under CEQA (Cal. Code Regs., tit. 14, § 753.5, subd. (c)(1)(A)). Lead agencies continue to be responsible for determining whether projects will have potentially significant environmental effects on the environment, including biological resources” (CDFW 2014). The County does not have jurisdiction to issue an NED for the Proposed Project.</p> <p>Finally, CEQA enables lead agencies to approve projects notwithstanding the existence of unavoidable adverse effects. This is accomplished by the lead agency’s adoption of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093, and substantial evidence in the record to support the economic, legal, social, technological, or other benefits of the Proposed Project.</p>
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<p>out of 1473 acres in our neighborhood will bring. We expressed our fears in writing during the appropriate comment period ending January 7, 2013.</p> <ul style="list-style-type: none"> <li>• At this time we request that no part of this SOITEC SOLAR PROJECT be approved without determining whether the project would <b>not</b> result in or have the potential to result in noise, vibration, dust, light, pollution, or an alteration in water quality that may affect fish and/or wildlife directly or from a distance.</li> <li>• The project would <b>not</b> result in or have the potential to result in direct or indirect destruction, ground disturbance, or other modification of any habitat that may support fish and/or wildlife species.</li> <li>• The project would <b>not</b> result in or have the potential to result in the removal of vegetation with potential to support wildlife.</li> </ul> <p>This could be accomplished by a <b>No Effect Determination (NED)</b></p> <p>Erosion is a natural process that is minimized by the natural vegetation that this Soitec project proposes to vanquish. In San Diego we already see the devastating effects of enough mudslides every time it rains to know better that to promote more.</p> <p>Boulevard is well known for high winds which send bare earth into the atmosphere, though not as spectacular as a big mud slide is still erosion with the side effect of air pollution. We should remember the effects of the tragic "dust bowl" from the U.S. Midwest in the 1930s.</p> <p>This project is designed to leave us with the same effects as a 1500 acre forest fire.</p> <p>If this Soitec proposal were to be approved at a program level without even an application for a Major Use Permit (MUP). It will encourage more such short sighted projects.</p>	<p><b>I83-2</b> Issues raised in this comment relate to erosion and secondary dust effects and were considered and addressed in the DPEIR; see Chapters 2.2 and 3.1.5. See the response to comment I27-2 regarding fugitive dust issues and proposed project design features, including those associated with operation of the Proposed Project.</p> <p><b>I83-3</b> The County disagrees that the Proposed Project is designed to leave the area with the same effects as a 1,500 acres forest fire. The applicants are only seeking Major Use Permits for the Rugged and Tierra del Sol Solar Farms, while the LanEast and LanWest Solar Farms are being analyzed at a programmatic level of detail (See DPEIR, p. S.0-1). Project level analysis for both LanEast and LanWest will be required when Major Use Permit applications are submitted for those projects.</p>
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<p>Our family home is located between two County Scenic Highways in the County Scenic Highway System. The house was chosen as our home because of its natural landscaping and scenic views in every direction. It was built in 1926 and is well known locally as the old Ruby store. We are immediately surrounded by about 300 acres of wild horse pastures peppered with a variety of trees. The pasture is a wetland, wide with a very gentle slope, a flood plain. It is teeming with life, from as big as the horses down to squirrels, kangaroo rats, snakes and frogs and lizards. Once in while you see bobcats or even a mountain lion. The trees and sky are filled with a variety of birds. Owls, ravens, hawks, jays and many more I cannot name. Some come and go with the seasons. At sunset there are sometimes bats.</p> <p>In the not too far distance are rows of mountain summits' sprinkled with fascinating rock formations. To the east and west you can see the sun rise and set unobstructed by buildings or billboards. It is plain to see why this area has been set aside as a scenic corridor.</p> <p>Even Soitec's own, applicant friendly PEIR analysis reveals that harmful aesthetics are significant and unavoidable. It reports the same about dust, "significant and unavoidable".</p> <p>Off premises Solar panel projects should not be placed in direct line of sight of any major access highways, even if they are not designated scenic view corridors, because of the inevitable occasional misalignment causing an unnecessary and unreasonable risk to highway safety from the resulting glare. This specific project advocates placing one thousand, one hundred and sixty-four 1600 square foot reflective panels between 2 designated view corridor highways, Historic Old Highway 80 and I-8, with a residence in the middle.</p> <p>The goals of my family, the Boulevard Community planning Group and the C O U N T Y O F S A N D I E G O G E N E R A L</p>	<p><b>I83-4</b> Issues raised in this comment are not inconsistent with the existing content of the DPEIR. Potential adverse effects to County scenic highways and scenic corridors were addressed in Chapter 2.1 of the DPEIR. The existing biological setting and wildlife resources are discussed in Chapter 2.3, Biological Resources.</p> <p><b>I83-5</b> This comment summarizes the conclusions presented in the DPEIR in regard to impacts to dust and aesthetic resources.</p> <p>The potential aesthetics impacts of the Proposed Project are discussed in Section 2.1, Aesthetics. Impacts associated with solar farm-generated glare (including potential impacts to motorists on Old Highway 80 and Interstate 8 (I-8)), are discussed in Section 2.1.3.3, Light and Glare. As stated in Section 2.1.3.3, the LanEast and LanWest solar farms would generate glare that would be visible from McCain Valley Road, Old Highway 80, and I-8 and based on County guidelines, glare impacts to motorists from the LanEast and LanWest solar farms would be significant. The potential issue of fugitive dust was evaluated and addressed in Chapter 2.2 of the DPEIR. Please also refer to response to comment O10-77 regarding the the Boulevard Glare Study and consideration of certain operational scenarios including operations during high wind events and periods of malfunction. As stated in Chapter 1.0, Project Description, two types of sensors are used to ensure that the focal point of concentrated sunlight is exactly on the solar cells at every moment of the day</p>
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<p>P L A N are congruent and compatible on this protection of scenic highways, and corridors, regionally issue. The goals of the promoters of this project would ask us to ignore this issue altogether to allow a 35 foot tall obstruction from the eastern horizon to the western horizon, to accommodate an incompatible, nonconforming development.</p> <p><b>GOALS AND POLICIES</b>  <b>GOAL COS-11</b>  <b>Preservation of Scenic Resources.</b> Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.  <b>Policies</b>  <b>COS-11.1 Protection of Scenic Resources.</b> Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.  <b>COS-11.2 Scenic Resource Connections.</b> Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.  <b>COS-11.3 Development Siting and Design.</b> Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:</p> <ul style="list-style-type: none"> <li>■ Creative site planning</li> <li>■ Integration of natural features into the project</li> <li>■ Appropriate scale, materials, and design to complement the surrounding natural landscape</li> <li>■ Minimal disturbance of topography</li> </ul>	<p>including a solar sensor that seeks to position the trackers precisely perpendicular to the sun to ensure optimum system performance (DPEIR pp. 1.0-6 to 1.0-7). Misalignment of trackers would affect system performance and therefore, the potential for misalignment would be reduced by operation of sensor systems.</p> <p>The commenter's concerns regarding potential misalignment of trackers and resulting glare impacts to I-8 motorists is noted and will be included in the administrative record for review and consideration by the decision makers.</p> <p><b>I83-6</b> General Plan Analysis Reports were prepared for the Tierra del Sol and Rugged solar farms (see Appendices 2.5-1 and 2.5-2 of the DPEIR). Because the LanEast and LanWest solar farms were analyzed at a programmatic level, General Plan Analysis Reports were not prepared for these solar farms (reports will be prepared during the project-level CEQA analysis process). Consistency determinations between applicable policies of the County General Plan, the Boulevard Subregional Plan, and the Mountain Empire Subregional Plan and the Tierra del Sol and Rugged solar farms are included in Appendices 2.5-1 and 2.5-2.</p>
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<p>Potential measures for promoting scenic compatibility may include limiting or avoiding soundwalls, placing utilities underground, <b>minimizing grading</b>, and providing scenic vista points.</p> <p>The pasture and flood plain surrounding our home is the proposed sight for Soitecs LanEast and LanWest projects. This project is entirely incompatible with Scenic View corridors, flood plains and our family home.</p> <p>The protection of our water supply is critical for the residents of Boulevard specifically and to the County and State generally. We cannot relocate our groundwater supply. We can however take every precaution to avoid any development that puts it at risk. Water is life!</p> <p>The goals of my family, the Boulevard Community planning Group and the COUNTY OF SAN DIEGO GENERAL PLAN are congruent and compatible on this water issue. The goals of the promoters of this project would ask us to risk the potential consequences of depleting our drinking water supply to accommodate an incompatible development.</p> <p>GOALS AND POLICIES COUNTY OF SAN DIEGO GENERAL PLAN 5-13 Impervious surface area impairs groundwater recharge and contributes to stormwater runoff and heat retention. GOAL COS-5 Protection and Maintenance of Water Resources. Protection and maintenance of local reservoirs, watersheds, aquifer-recharge areas, and natural drainage systems to maintain high-quality water resources.</p>	<p><b>I83-7</b> As stated in Chapter 1.0, Project Description, Location and Environmental Setting, grading would be necessary for the construction of access and service roads and the installation of trackers; trenching for the electrical DC and AC collection system, including the telecommunication lines; installation of the inverter stations; construction of an overhead 34.5 kilovolt trunk line for collection systems leading to the Proposed Project substation; and construction of the Proposed Project substation, an operations and maintenance building, and the gen-tie line from the Proposed Project substation to the identified regional substation. The aesthetics impacts associated with construction and operation of the Proposed Project are discussed in Chapter 2.1, Aesthetics, of the DPEIR. The provision of scenic vista points was not identified in the DPEIR as a measure that would mitigate the visual impacts of the Proposed Project. Also see response to comment I17-5.</p> <p>The noise impacts associated with construction and operation of the Proposed Project are discussed in Chapter 2.6, Noise. Permanent noise walls were not included in mitigation measures that would be implemented by the Proposed Project and would not be required to attenuate operational noise to below County of San Diego Noise Ordinance thresholds.</p> <p><b>I83-8</b> The commenter's opposition to the Proposed Project is noted and will be included in the administrative record for review and consideration by the decision makers. Per</p>
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<p>Water conservation is also addressed in Goal COS-19 in the “Air Quality, Climate Change, and Energy” section below.</p> <p>Policies</p> <p>COS-5.1 Impact to Floodways and Floodplains. Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element.</p> <p>Development in floodways and floodplains has the potential to alter natural hydrologic flow and cause soil erosion and increased stormwater runoff—including loss of wetland and health issues related to surface and groundwater contamination.</p> <p>COS-5.2 Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.</p> <p>COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.</p> <p>COS-5.4 Invasive Species. Encourage the removal of invasive species to restore natural drainage systems, habitats, and natural hydrologic regimes of watercourses.</p> <p>COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.</p> <p>Protecting reservoir water quality requires that the quality of the water entering the reservoirs is maintained or improved. Pollutants of high concern are nutrients and related algae, total organic carbon, and total dissolved solids.</p>	<p>CEQA guidelines and County thresholds, the visual analysis of Proposed Project effects is required only from public viewpoints. CEQA analysis is not required for private property. However, consideration of community character and local visual resources and aesthetics are intended to identify the Proposed Project’s overall effects on local visual resources.</p> <p>The County agrees that the Proposed Project may have substantial adverse effects related to aesthetics. The concern regarding potential impacts due to the presence of solar panels in residential areas is noted. Also see DPEIR Chapter 3.1.4 Hazards and response to comment I17-5.</p> <p><b>I83-9</b> The County agrees with this comment regarding the importance of groundwater. This comment does not raise specific issues related to the Proposed Project or the adequacy of the environmental analysis in the DPEIR; therefore, no additional response is provided or required.</p> <p><b>I83-10</b> See the response to comment I83-6. Consistency determinations between applicable policies of the County General Plan, the Boulevard Subregional Plan, and the Mountain Empire Subregional Plan and the Tierra del Sol and Rugged solar farms are included in Appendices 2.5-1 and 2.5-2.</p>
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<p>The extent of this proposed program is entirely within special areas. The Special Area Designator, for instance “A” is not a zone. It is significant evidence that a condition exists. I do not believe that any authority can vote that condition out of existence. It is the condition which assures that consideration is provided areas of special interest or unusual value. It defies logic to suggest that an electrical transmission tower off in the distance or a substation within a community would alter that condition any more than drop of white-out over an “A”. The proponents of these projects are not seeking a variance to convert a single family home to a duplex. They want to convert a scenic agricultural preserve to a nonconforming factory without walls in direct conflict with the goals of my family, the Boulevard Community planning Group, and the COUNTY OF SAN DIEGO GENERAL PLAN.</p> <p>6952 SOLAR ENERGY SYSTEM</p> <p>b. Solar Energy System, Offsite Use shall be permitted as follows:</p> <p>4. Special Area Regulations: Photovoltaic solar energy systems for offsite use subject to a <b>Special Area Designator <u>must comply with the applicable Special Area Regulations</u></b> provisions of Sections 5000 through 5999.</p> <p>(Added by Ord. No. 10072 (N.S.), adopted 9-15-10)</p> <p>PART FIVE: SPECIAL AREA REGULATIONS</p> <p>GENERAL PROVISIONS</p> <p>5000 GENERAL INTENT OF THE SPECIAL AREA REGULATIONS.</p> <p>The provisions of Section 5000 through Section 5999, inclusive, <b><u>shall be</u></b> known as the Special Area Regulations. The purpose of these provisions is to set forth specialized regulations which have limited application within San Diego County and <b><u>which assure that consideration is provided areas of special interest or unusual value.</u></b></p>	<p><b>I83-11</b> The Proposed Project includes parcels zoned S92 (General Rural), A72 (General Agriculture), and A70 (Agriculture). The County agrees that the parcels zoned A70 and A72 are subject to a Special Area Designator “A” pursuant to Zoning Ordinance Section 5100, which requires findings of compatibility be made by the County (see DPEIR, Section 3.1.1, Agricultural Resources). As stated in Chapter 1.0 of the DPEIR (see Table 1-11, Approvals/Permits to be Obtained), a rezone to remove Special Area Designator “A” is proposed for the Tierra del Sol solar farm site and an Agricultural Preserve Disestablishment Report has been prepared for the Tierra del Sol project (see DPEIR Appendix 3.1.1-2). The Proposed Project is not entirely within areas covered by special area regulations since the areas zoned S92, including the entirety of the LanEast and LanWest solar farm sites, do not have a special area designation.</p> <p>See the response to comment I83-6 related to potential conflicts of the Proposed Project with the goals of applicable County planning documents; consistency determinations between applicable policies of the County General Plan, the Boulevard Subregional Plan, and the Mountain Empire Subregional Plan and the Tierra del Sol and Rugged solar farms are included in Appendices 2.5-1 and 2.5-2.</p> <p>This comment provides a copy of Part Five of the Zoning Ordinance, Sections 5000, 5010, 5015, and 5020, with emphasis added.</p>
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<p>5010 MODIFICATIONS IMPOSED BY SPECIAL AREA REGULATIONS.</p> <p>The provisions of individual special area <b>regulations <u>shall</u> be in addition to regulations imposed by the Use Regulations</b>, Animal Regulations or Development Regulations. When more than one regulation is applicable to the same subject matter within a zone, the most restrictive regulation shall apply.</p> <p>(Amended by Ord. No. 8166 (N.S.) adopted 10-21-92)</p> <p>5015 APPLICATION AND DESIGNATION.</p> <p>a. Application. A Special Area Regulation <b><u>shall</u> be deemed applicable when conditions or purposes specified within individual Special Area Regulations are found present within San Diego County and a Special Area Designator is included within a zone.</b></p> <p>b. Location of Designator. Designators for Special Area Regulations shall follow the designators for the Development Regulations.</p> <p>c. Notation. Special Area Regulations applicable within a zone shall be indicated by a letter pursuant to the table at Section 5025.</p> <p>A dash ("-") shall indicate that there are no Special Area Regulations applicable to the property.</p> <p>(Amended by Ord. No. 8581 (N.S.) adopted 9-20-95)</p> <p>5020 USE PERMITS.</p> <p>When Special Area Regulations require the issuance of a Minor Use Permit or a Major Use Permit, <b>such permits shall only be issued when the proposed use satisfies <u>all</u> conditions and requirements of the Special Area Regulations and is found consistent with the intent and purpose of the applicable Special Area Regulations.</b></p> <p>We have practical issues in addition to the above mentioned scenic issues, dust issues, erosion issues and water issues.</p>	<p><b>I83-12</b>      The comment is introductory in nature and is addressed specifically in the responses below.</p>
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I83-11  
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I83-12

<p>One is the concern of dirty electricity being discharged into the earth in such close proximity to our home. This is likely to cause health problems for us and our pets. It is also likely to create problems with our household electrical system, communication equipment, well pumps, appliances, computers, etc..</p> <p>Fire and the increased hazard due to the high temperatures these panels operate at increases the risk substantially in addition to the high voltage wiring surrounding our house and yard. Probably this nuisance issue is the most obvious and serious per Public Resources Code Section 4171.</p> <p>4171. Any condition endangering public <u>safety</u> by creating a fire hazard and which exists upon any property which is included within any state responsibility area is a public nuisance.</p> <p>The design criteria of the LanEast and LanWest portion is for 1164 huge reflective panels to be aimed at my residence for several hours every day between sunrise and sunset operating at temperatures in the 180 degrees range and more. I would have to paint the east and west sides of our house twice as often with the effect of two sunrises and two sunsets every day. It will also add costs to cool and filter the air in our home and conflict with our policy of power conservation.</p> <p>We are also concerned about noise from wind blowing between and around 1164 panels in addition to 1164 tracker motors humming simultaneously running continuously.</p> <p>There is a previously approved sight in Imperial Valley where this project is welcome. We don't need it or the litigation it is likely to bring. Remember the Witch Creek, Guejito and Rice Canyon fires, 1300 homes burned, killed two people and burned ranches and farms in 2007.</p>	<p><b>I83-13</b> The County acknowledges the commenter's concern associated with dirty electricity. The County assumes the commenter is referring to electric and magnetic fields (EMF). Recognizing there is a great deal of public interest and concern regarding potential health effects and hazards from exposure to EMFs, the DPEIR provides information regarding these potential issues; see Section 3.1.4.5 of the DPEIR. However, the DPEIR does not consider EMFs in the context of the CEQA for determination of environmental impact because there is no agreement among scientists that EMFs create a health risk and because there are no defined or adopted CEQA standards for defining health risks from EMFs. As a result, the EMF information is presented for the benefit of the public and decision makers. Furthermore, in response to this comment and other comments regarding EMF, a memorandum was prepared by Asher R. Sheppard, PhD to support the information provided in the DPEIR and provide more detail; see Appendix 9.0-1. The memorandum concludes that EMF from the Proposed Project are highly localized and pose no known concern for human health.</p> <p><b>I83-14</b> The County acknowledges the commenter's concern with fire risk in the Boulevard area and fire hazards associated with the Proposed Project.</p> <p>The DPEIR is based on extensive analysis conducted in coordination with the fire agencies, including the San Diego County Fire Authority (SDCFA), California</p>
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	<p>Department of Forestry and Fire Protection (CalFire), and San Diego Rural Fire Protection District, and is consistent with industry standards and procedures. As stated in the DPEIR, Section 3.1.4.3.3, an increase in the risk of wildland fire would occur on the site during construction and decommissioning where there is the largest amount of fuel on the site combined with increased activity and ignition sources. However, with implementation of a site-specific Construction Fire Prevention Plan that will be approved by the SDCFA and CalFire as described in project design feature (PDF) PDF-HZ-2, as well as with implementation of PDF-TR-1, which would ensure safe access in the area during construction for emergency responders, impacts are anticipated to be less than significant during construction and decommissioning. Additionally, it should be noted that the Proposed Project would contribute funding toward local emergency response capabilities (PDF-PS-1).</p> <p>The County generally agrees that the Proposed Project would introduce possible ignition sources. Additionally, the equipment on the sites presents a potential challenge to firefighters due to accessibility issues around the solar equipment and a lack of training and experience in firefighting where such equipment exists. To reduce the risk of fire on the site and improve the effectiveness of an emergency response should a fire occur on site, site-specific Fire Protection Plans (FPPs) for the Tierra del Sol solar farm (Appendix 3.1.4-5 of the DPEIR) and the</p>
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	<p>Rugged solar farm (Appendix 3.1.4-6 of the DPEIR) have been prepared, will be approved, and will be implemented. The FPPs were prepared by a County-approved CEQA consultant in accordance with the County's <i>Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection</i>, dated August 31, 2010. As per PDF-HZ-3, similar site-specific FPPs will be prepared and approved by the SDCFA for the LanEast and LanWest solar farms prior to approval of a Major Use Permit.</p> <p>With regard to electrical fires, please refer to the response to comment O10-82.</p> <p><b>I83-15</b> The issues raised in this comment related to potential glare impacts were considered and addressed in the DPEIR (see Chapter 2.1, Aesthetics). Please refer to common response AES1 regarding the methodology and adequacy of the analysis of anticipated glare exposure and impacts provided in the DPEIR. See response to comment I1-1 related to heat.</p> <p><b>I83-16</b> The County acknowledges the commenter's concerns regarding equipment noise simultaneously running and wind movement. The noise from all proposed equipment at each solar installation was quantified in the DPEIR (see Chapter 2.6, Noise) which demonstrates compliance with the County Noise Ordinance. Noise related to wind movement is created when wind passing over a surface causes the surface to vibrate. The trackers are rigid panels</p>
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<p>Please recognize Boulevard for its own value and contribution for what it is, a beautiful agricultural preserve and recreational community. 183-19</p> <p>I would also comment that it would be deceptive to approve any project at a “program” level when there is no application for a permit. That is information available from zoning records and building codes. A program with a name and location is a project. It requires a permit application and an EIR. If an applicant wants to submit several projects as a program if any element fails the entire program must fail. This deception could lead investors to buy-in thinking that a project was viable because it was approved at a program level without so much as a permit application being filed. 183-20</p> <p>Apparently even Soitec recognizes the obvious flaws in LanEast and LanWest because they have withdrawn their use permit application. 183-21</p> <p>Please do not alter the county’s general plan to accommodate such a nonconforming program. Such approval may result in the unintended consequence of adversely affecting the property value of my home and all of rural San Diego County. 183-22</p> <p>It should be confirmed that Boulevard is an agricultural preserve within a scenic view corridor so it will be clear that it will be preserved per the Boulevard Community planning Group and the C O U N T Y O F S A N D I E G O G E N E R A L P L A N. 183-23</p> <p>Thank you</p>  <p>Daniel Renard</p>	<p>that are not prone to vibration; therefore, the solar installation would not be anticipated to increase noise levels generally associated with existing wind patterns in the region.</p> <p><b>I83-17</b> See response to comment O10-7.</p> <p><b>I83-18</b> The commenter is referred to response to comment I83-14.</p> <p><b>I83-19</b> The County acknowledges this comment. This comment does not raise specific issues related to the Proposed Project or the adequacy of the environmental analysis in the DPEIR.</p> <p><b>I83-20</b> The County acknowledges that consideration for additional environmental review will be necessary for the actions related to the LanEast and LanWest sites, but believes that there are advantages in analyzing and disclosing effects related to those actions at this time in a programmatic manner. The LanEast and LanWest components fit the description of the types of actions for which a programmatic EIR may be prepared, as outlined in Section 15168 of the CEQA Guidelines, in that they are related geographically and are logical parts in the chain of contemplated actions. Addressing these components at a programmatic level offers the advantages of providing a more exhaustive consideration of effects and alternatives than would be available for an EIR on the project-level actions alone. In addition, the program-level analysis provides a more robust consideration of cumulative impacts, and may provide the</p>
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	<p>basis for determining whether the subsequent activities may have significant effects. Project level analysis will be required when Major Use Permit applications are submitted for LanEast and LanWest.</p> <p><b>I83-21</b> The County acknowledges this comment. As stated in Section 1.1 of the DPEIR, the applicants are seeking project-level approvals for only the Tierra del Sol and Rugged solar farm projects, which are analyzed at a project-level of detail. The LanEast and LanWest solar farms are analyzed at a programmatic level, because sufficient project-level data has not been developed at this time. Project level analysis will be required when Major Use Permit applications are submitted for LanEast and LanWest.</p> <p><b>I83-22</b> This comment raises concerns regarding property values. This topic was not evaluated in the DPEIR since it is not related to environmental impacts. However, this information can be presented to decision makers for their consideration during the hearing process for the Proposed Project.</p> <p><b>I83-23</b> See response to comment I83-11.</p> <p><b>References</b></p> <p>CDFW (California Department of Fish and Wildlife). 2014. “No Effect Determination (NED).” Web page. Sacramento, California: CDFW Habitat Conservation Branch.  <a href="https://www.dfg.ca.gov/habcon/ceqa/nedprocess.html">https://www.dfg.ca.gov/habcon/ceqa/nedprocess.html</a>.</p>
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	<p>County of San Diego. 2010. <i>Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection</i>. County of San Diego, Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. March 19, 2007; last updated August 31, 2010. <a href="http://www.sdcounty.ca.gov/pds/docs/Fire-Guidelines.pdf">http://www.sdcounty.ca.gov/pds/docs/Fire-Guidelines.pdf</a>.</p> <p>County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.</p>
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